

## Submission Form (Form 5)

# Submission on Proposed Kaipara District Plan

Form 5: Submissions on a Publicly Notified Proposed District Plan under Clause 6 of Schedule 1 of the Resource Management Act 1991

### Return your signed submission by Monday 30 June 2025 via:

**Email:** [districtplanreview@kaipara.govt.nz](mailto:districtplanreview@kaipara.govt.nz) (subject line: Proposed District Plan Submission)

**Post:** District Planning Team, Kaipara District Council, Private Bag 1001, Dargaville, 0340

**In person:** Kaipara District Council, 32 Hokianga Road, Dargaville; or  
Kaipara District Council, 6 Molesworth Drive, Mangawhai

If you would prefer to complete your submission online, from 28 April 2025 please visit:

[www.kaipara.govt.nz/kaipara-district-plan-review/proposed-district-plan](http://www.kaipara.govt.nz/kaipara-district-plan-review/proposed-district-plan)

All sections of this form need to be completed for your submission to be accepted. Your submission will be checked for completeness, and you may be contacted to fill in any missing information.

**Full name:**

**Phone:**

**Organisation:**

*(\*the organisation that this submission is made on behalf of)*

**Email:**

**Postal address:**

**Postcode:**

**Address for service: name, email and postal address** *(if different from above):*

### Trade Competition

Pursuant to Schedule 1 of the Resource Management Act 1991, a person who could gain an advantage in trade competition through the submission may make a submission only if directly affected by an effect of the proposed policy statement or plan that:

- a) adversely affects the environment; and
- b) does not relate to trade competition or the effects of trade competition.

### Please tick the sentence that applies to you:

I could not gain an advantage in trade competition through this submission; or

I **could** gain an advantage in trade competition through this submission.

***If you have ticked this box please select one of the following:***

I am directly affected by an effect of the subject matter of the submission

I **am not** directly affected by an effect of the subject matter of the submission

**Signature:**



**Date:**

*(Signature of person making submission or person authorised to sign on behalf of person making the submission.)*

**Please note:** all information contained in a submission under the Resource Management Act 1991, including names and addresses for service, becomes public information.

I **do not** wish to be heard in support of my submission; or

I do wish to be heard in support of my submission; and if so,

I would be prepared to consider presenting my submission in a joint case with others making a similar submission at any hearing

<b>(1)</b> The specific provisions of the Proposed Plan that my submission relates to are:		<b>(2)</b> My submission is that: <i>(include whether you support or oppose the specific provisions or wish to have them amended and the reasons for your views)</i>		<b>(3)</b> I seek the following decisions from Kaipara District Council. <i>(Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand your concerns.)</i>
Chapter/Appendix/ Schedule/Maps	objective/policy/rule/ standard/overlay	Oppose/support (in part or full)	Reasons	

Add further pages as required – please initial any additional pages

30 June 2025

Ref: PDP Submission

Kaipara District Council  
Private Bag 1001  
Dargaville 0340  
New Zealand

Sent via email: [districtplanreview@kaipara.govt.nz](mailto:districtplanreview@kaipara.govt.nz)

Dear Kaipara District Plan Team

**Submission on the Proposed Kaipara District Plan 2025 in accordance with Clause 6 of Schedule 1, Resource Management Act 1991**

**Introduction**

Horizon Surveying and Land Development is a multidisciplinary land development consultancy with established expertise in planning, landscape architecture, architecture and surveying. With a strong presence across Northland and Auckland, we are proud to maintain a local office in Mangawhai. Our team includes surveyors, planners, a landscape architect, and an architectural designer, bringing together a diverse mix of technical expertise and practical experience across a range of projects within the Kaipara District, including rural subdivisions, residential, and commercial developments.

We are deeply familiar with the Operative District Plan and planning provisions across the region and regularly engage with Kaipara District Council, iwi, and other stakeholders.

The feedback provided in this submission on the Proposed Kaipara District Plan (PDP) draws on our extensive experience preparing and lodging resource and building consent applications in the district. This includes navigating the nuances of local planning provisions, responding to Council queries, and supporting clients through the full consenting process. Our insights are informed not only by technical knowledge but also by practical experience in how the Plan is applied on the ground.

As the director of the Horizon team, my role involves close collaboration with clients, consultants, and Council staff to ensure that applications are robust, well-communicated, and aligned with district expectations.

Personally, I grew up in the district and have witnessed significant change over the last 30 years. I support the growth of the region, and as a company we are committed to providing well-considered and appropriate developments.

## **Submission Overview**

While we support the overall intent of the PDP to enable development, we cannot support the Plan in its current form. In our view, it does not adequately protect Kaipara's landscape values or rural character, and it misses key opportunities to guide growth in a coherent and context-sensitive manner that integrates well with existing residential areas.

We are particularly disappointed that several well-considered elements of the Exposure Draft developed through public and stakeholder engagement have not been retained in the PDP. The removal of the Rural Production Zone and the scaling back of the Rural Lifestyle Zone are notable regressions. These changes reduce the Plan's ability to manage rural land use effectively and respond to the district's diverse environmental and settlement patterns. We strongly encourage Council to revisit the more refined zoning framework presented in the Exposure Draft.

Furthermore, we consider that the PDP requires additional refinement to address key shortcomings. These include a lack of clarity around subdivision pathways, inconsistencies in zoning logic, inappropriate activity statuses, and provisions that are difficult to interpret and apply. Targeted amendments are needed to ensure the Plan is practical, enabling, and consistent with sound planning practice.

## **Comments on Specific Environments**

### Residential Environment

The application of a single General Residential Zone (GRZ) across all residential areas fails to reflect the diversity of residential environments within the district from larger urban centres like Mangawhai and Dargaville to smaller coastal settlements such as

Pahi and Whakapirau. A one-size-fits-all approach is not appropriate. Additional zones or precinct overlays should be introduced to recognise these differences. For example, the Medium Density Residential Zone proposed in the Exposure Draft would support appropriate intensification in areas such as Mangawhai Village, where it could enable more efficient and coordinated urban growth.

### Rural Environment

The General Rural Zone currently covers approximately 78% of the district. While intended to support primary production, the operative plan has already enabled fragmentation of rural land. The PDP continues this pattern, with subdivision pathways that risk further undermining productive capacity. We recommend introducing a two-tier framework (Rural Production and General Rural zones), as outlined in the Exposure Draft, to better manage this balance.

### Rural Lifestyle Environment

We support the Rural Lifestyle Zone (RLZ) as a transitional tool between rural and residential environments. However, several areas where lifestyle development is already established particularly around Mangawhai (e.g., Tara Road, Garbolino Road, Devich Road) have been omitted. These areas should be rezoned RLZ to reflect their existing development pattern. Conversely, areas such as the Oneriri and Pahi peninsulas, which are coastal and less suited to further fragmentation, should be consolidated under Rural zoning.

### Mangawhai-Hakaru Managed Growth Area

We do not support the Managed Growth Area overlay as currently drafted. While the intent to coordinate growth and infrastructure is sound, the mechanism is too rigid and risks unnecessarily constraining development. More flexible tools such as structure planning, revised zoning, and infrastructure assessments would better support responsive and context-sensitive growth.

Based on the above, Horizon does not support the PDP as currently drafted and submits that changes are necessary to ensure the Plan is functional and supports appropriate, well-managed development. Our completed Form 5 and detailed submission points are attached as **Attachment 1**.

Should you have any questions, please do not hesitate to contact us. We welcome continued engagement with Council throughout the District Plan review process.

Kind regards

A handwritten signature in black ink that reads 'Joe Fletcher'.

Joe Fletcher  
Director  
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**Contributors**

Mike Dance – Planning Manager  
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Inc.

**Attachment 1** – Form 5 Submission Form and provisions

## Horizon Surveying and Land Development - PDP Submission

#	Chapter / Appendix / Schedule / Maps	Objective / Policy / Rule / Standard / Overlay	Oppose / Support	Reasons	Decision Sought
1.	Maps	Rural Lifestyle Zoning	Oppose in part	Several areas around Mangawhai such as Tara Road, Garbolino Road, Cove Road, King Road, Devich Road, and Cames Road have established rural lifestyle development and are well suited to RLZ zoning but are currently excluded. These areas are close to services and were identified in the Exposure Draft as appropriate for this zone.	Reintroduce the Rural Lifestyle Zone in appropriate locations, particularly in the transitional areas surrounding Mangawhai (e.g. Tara Road, Garbolino Road, Cove Road, King Road, Devich Road, and Cames Road).
2.	Maps	Rural Lifestyle Zoning	Oppose in part	Areas such as the Oneriri and Pahi peninsula that are in a coastal environment are not appropriate to be zoned as Rural Lifestyle and the zoning should be consolidated in this location.	Consolidate the Rural Lifestyle Zone around the town centres. Minor changes should around Kaiwaka, Paparoa and Maungaturoto to better reflect the landform and existing roading patterns.
3.	Maps	General Rural Zone	Oppose in part	The use of a single General Rural Zone does not reflect the diversity of rural land use across the district. Large areas are already fragmented and no longer suitable for productive farming. The Exposure Draft proposed a Rural Production Zone, which we consider more appropriate for protecting high-quality soils and productive land.	Introduce a Rural Production Zone, consistent with the Exposure Draft, to protect productive land and differentiate it from already fragmented rural areas.

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4.	Maps	General Residential Zone	Oppose in part	The Plan does not adequately provide for smaller, established rural-coastal settlements such as Pahi, and Whakapirau. These areas have a distinct character and scale that is not well addressed by the General Residential zones.	Introduce a Settlement Zone to manage the unique character and development needs of smaller rural-coastal communities.
5.	Maps	Mangawhai/Hakaru Managed Growth Area	Oppose	While we acknowledge the intent to coordinate development with infrastructure provision, the Managed Growth Area imposes a rigid and inflexible planning mechanism. It may unnecessarily constrain appropriate and feasible development, and does not allow for responsiveness to landowner readiness, infrastructure staging, or changing demand.	Remove the Mangawhai/Hakaru Managed Growth Area.
6.	Maps	Commercial Zoning – Moir Street	Amend	The current zoning of Moir Street under the PDP creates an artificial break in the commercial zoning between the existing town centre and other existing commercial activities along Moir St. These commercial activities form part of the built environment, with community-	Amend the zoning along Moir Street to better reflect existing development, enable appropriate activities, and provide for integrated land use and community wellbeing.

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				focused, non-residential uses consistent with the character and amenity of the area. The PDP zoning does not reflect the existing pattern of land use or the site's suitability for low-impact, adaptive reuse of buildings for commercial and community purposes.	
6.	Definitions	All Definitions	Amend	The list of definitions includes duplicate or closely related terms, which introduces unnecessary complexity and potential confusion. For example, the terms <i>"Impermeable Surface"</i> and <i>"Impervious Surface"</i> appear to overlap and could be consolidated for clarity.	Remove or consolidate duplicate definitions where appropriate.
7.	Definitions	Boundary Adjustment	Amend	The PDP does not define term <i>"adjoining allotments"</i> under the definition of 'Boundary Adjustment'. In practice, this creates uncertainty when allotments are separated by roads, streams, or similar features. The PDP should align with the RMA and to improve interpretation and administration.	Clarify that allotments separated by a road, access lot, railway, stream, or river are considered adjoining in line with Section 220(2)(b) of the RMA.

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8.	Definitions	Earthworks	Amend	Excavated foundation holes/footing for supporting a new, relocated or additions to buildings have previously been treated as earthworks and created unnecessary technical District Plan infringements. The definition should specifically exclude excavated foundation holes/footing for supporting new buildings or additions.	Amend the definition to exclude excavated foundation holes/footing for supporting new, or relocated buildings or additions to existing buildings
9.	Definitions	Home Business	Amend	The definition of <i>Home Business</i> is unclear in its use of the term "incidental to the use of the site for a residential activity." It is ambiguous how "incidental" is to be interpreted in practice, which could lead to inconsistent application. Without clarification, it is difficult to determine the scale or intensity of business activity permitted under this definition.	Delete b.
10.	Definitions	Impermeable Surface / Impervious Surface	Amend	The definitions refer to non-vegetated surfaces, which may unintentionally include areas that have been subject to earthworks. There is also unnecessary overlap	Consolidate or amend the definitions of "Impermeable Surface" and "Impervious Surface" to remove duplication and ensure clarity. Clarify whether earth

## Horizon Surveying and Land Development – PDP Submission

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				between the two definitions, particularly regarding references to wooden or slatted decks, which creates confusion and duplication.	worked areas are intended to be included and provide consistent treatment of features such as wooden or slatted decks. The use of the term 'Rain Tanks' lacks clarity and should be amended to be 'Rainwater Collection Tanks'
11.	Definitions	Accessway	Amend	The definition provides no reference to vehicular use of an accessway yet <i>Rule GRZ-S3 Height in relation to boundary</i> specifically refers to 'Vehicle' Accessway.	Reword the definition of Accessway to include the use of vehicles.
12.	Definitions	Net Site Area	Amend	Part C refers to parts of the site used for access, but 'access' is undefined and could be interpreted inconsistently.	Delete c.
13.	Definitions	Residential Unit	Amend	The current definition suggests that a residential unit must include all the listed facilities. Clarification is needed on whether each element is mandatory, and additional definition should be provided for terms such as "cooking facility" to avoid ambiguity.	The definition needs to be reviewed for clarity and ease of interpretation, as facilities could be open to interpretation.
14.	Strategic Direction - Vision for Kaipara - Objectives	SD-VK-01 to SD-VK-08	Support in Part	SD-VK-04 States that " <i>Rural lifestyle development is concentrated in appropriate locations to contribute to</i>	The objective should reworded and remove the words " <i>the distribution of</i> ".

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				<i>the distribution of population growth in the District ...". Rural Lifestyle development should not be to used as the only mechanism to distribute the growth of the district.</i>	
15.	Urban Form & Development - Objectives	SD-UFD-O1 to SD-UFD-O5	Support	We support objectives 1-5	Retain these objectives in the plan
16.	Urban Form & Development - Policies	SD-UFD-P1 to SD-UFD-P6	Support	We support policies 1-6	Retain these objectives in the plan
17.	Urban Form & Development - Policies	SD-UFD-P7	Oppose	We do not support the Mangawhai/Hakaru Managed Growth Area as outlined.	Delete
18.	Natural Character - Objectives	NATC-O1	Support	Support the objectives	None
19.	Natural Character - Policies	NATC-P1 to NATC-P5	Support	Support the policies	None
20.	Natural Character - Rules	NATC-R1 to NATC-R4	Support	Support the rules	None
21.	Natural Character - Standards	NATC-S1 to NATC-S3	Support	Support the standards	None
22.	Natural Features and Landscapes	General structure	Amend	The 'standards' heading is inconsistent with the chapter heading, and the eplan.	Rename the chapter to be 'Outstanding Natural Features and

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					Landscapes' so that it is consistent throughout the plan.
23.	Natural Features and Landscapes - Objectives	NFL-O1 to NFL-O2	Support	Support the objectives	None
24.	Natural Features and Landscapes - Policies	NFL-P1 to NFL-P6	Support in part	NFL-P4 2.c.iv does not specify lighting restrictions. NFL-P6 doesn't discuss positive effects on the Outstanding Natural Landscapes (ONL) and Outstanding Natural Features (ONF) from development in much detail.	Elaborate on NFL-P4 to include having regard to lighting. Elaborate on NFL-P6 Point 2 to include positive effects on the restoration or enhancement of the ONF or ONL which could be achieved through subdivision or development.
25.	Natural Features and Landscapes - Rules	NFL-R1 to NFL-R8	Support	Support the rules	None
26.	Natural Features and Landscapes - Standards	NFL-S1 to NFL-S6	Support in part	NFL-S3 Exterior colour and reflectivity: A reflectance value of 30-35% will provide a variety of colour options which are not suitable and could be visually prominent in the landscape. Lighting restrictions could also be included NFL-S3.	Refine NFL-S3 to limit colours and tones to a neutral palette eg. browns, greys, deep blues, deep greens. Include specifications for utilising downlights or light covers.

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27.	Subdivision - Objectives	SUB-O1 to SUB-O5	Support in Part	While SUB-O1 to SUB-O5 are generally supported, SUB-O3 does not appropriately account for already fragmented land. These sites require a different planning response than large, productive rural blocks.	Amend SUB-O3 to reflect fragmented land typologies.
28.	Subdivision – Policies	SUB-P1	Support in Part	SUB-P1 could better reflect best practice subdivision design. At present, it lacks direction on integrated design, landform responsiveness, and environmental integration.	Amend SUB-P1 to incorporate best practice subdivision design principles, including site-responsive layouts, protection of natural features, and integrated infrastructure design.
29.	Subdivision – Policies	SUB-P2 to SUB-P6, SUB-P8	Support	Support the policies	None
30.	Subdivision – Policies	SUB-P7	Support in part	SUB-P7 lacks clear reference to the protection and enhancement of natural features and landscapes, which are essential for maintaining rural character and environmental values.	Amend SUB-P7 (or add a new policy) to include specific provisions for the protection and enhancement of landscapes, ecological features, and rural character.
31.	Subdivision – Policies	SUB-P11 and SUB-P13	Support in part	SUB-P11 and SUB-P13 are supported in principle, but they duplicate broader subdivision matters and could be consolidated into general	Consolidate SUB-P11 and SUB-P13 into the general subdivision policy framework to avoid repetition and improve clarity.

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#	Chapter / Appendix / Schedule / Maps	Objective / Policy / Rule / Standard / Overlay	Oppose / Support	Reasons	Decision Sought
				policies. This would improve the usability and integration of the policy framework.	
32.	Subdivision – Policies	SUB-P11 – Mangawhai Design Guidelines	Oppose in part	SUB-P11 references the Mangawhai Design Guidelines, which are not included in the PDP and are outdated. This creates uncertainty for applicants and decision-makers.	Either revise and/or include an updated version of the Mangawhai Design Guidelines in the PDP, or; Replace the reference with more specific assessment matters that relate to rural character and amenity within the plan provisions.
33.	Subdivision - Policies	SUB-P12	Oppose	We do not support the Mangawhai/Hakaru Managed Growth Area as outlined.	Delete SUB-P12.
34.	Subdivision – Rules	Assessment Criteria for controlled activities	Amend	There is a lack of assessment criteria when requiring consideration of the effects of a subdivision on rural character and amenity.	Add assessment criteria to the subdivision rules that require evaluation of effects on rural character and amenity.
35.	Subdivision - Rules	SUB-R1 and SUB-R3	Support	Support the rules	None
36.	Subdivision - Rules	SUB-R4	Oppose in Part	SUB-R4 enables up to five additional allotments as a controlled activity,	Amend SUB-R4 to limit subdivision to a maximum of two

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				which risks promoting ad-hoc and ribbon development, particularly in rural areas. This blanket provision does not adequately consider local context or surrounding development patterns. The current rule may result in outcomes that undermine rural character or overburden local infrastructure. While small-lot subdivision may be appropriate where it aligns with an existing rural-residential pattern, a more targeted and effects-based approach is required.	additional lots and change the activity status to Restricted Discretionary and include assessment criteria requiring consideration of rural character, amenity values, and the existing development pattern of the surrounding area.
37.	Subdivision - Rules	SUB-R6 and SUB-R7	Support in part	While we support the intent of SUB-R6 and SUB-R7, the activity statuses are too permissive. As controlled activities, they limit the ability for Council to decline inappropriate subdivision proposals.	Change the activity status of SUB-R6 and SUB-R7 to Restricted Discretionary to enable better oversight of subdivision proposals.
38.	Subdivision – Rules	SUB-R6 and SUB-R7 – Consent Notice Mechanism	Support in part	A more robust mechanism for protecting indigenous vegetation, habitats, natural wetlands, or dunelands would be via covenants.	Replace with more robust mechanisms such as legal covenants or protection secured through consent conditions supported by ecological management plans

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#	Chapter / Appendix / Schedule / Maps	Objective / Policy / Rule / Standard / Overlay	Oppose / Support	Reasons	Decision Sought
39.	Subdivision - Rules	SUB-R6 and SUB-R	Support in part	Wording in provisions such as "all areas" (1c) and "the land" (1h) is vague and open to interpretation, creating uncertainty in plan implementation.	Amend SUB-R6 and SUB-R7 to clarify ambiguous terms such as "all areas" and "the land".
40.	Subdivision - Rules	SUB-R6 and SUB-R7  Ecological Management Plan Requirements	Support in part	Requiring an ecological management plan as part of the subdivision application is unnecessary and should instead be addressed as a post-consent condition.	Remove ecological management plan requirements from subdivision application requirements.
41.	Subdivision - Rules	SUB-R9	Support in Part	The activity status for both the subdivision of minor residential units in the residential and rural zones should be consistent	Make the subdivision of a minor residential units a discretionary activity in all zones.
42.	Subdivision - Rules	Medium density residential zone	Amend	The PDP removes the Medium density residential zone provisions outlined within Draft Exposure Plan that provided for well-designed raised density growth to occur in an appropriate manner within suitable existing residential regions.	Reintroduce the Medium density residential zone provisions

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43.	Subdivision – Rules	Integrated Development	Amend	The PDP removes integrated development provisions that previously provided for well-designed outcomes balancing rural productivity, environmental benefit, and growth.	Reintroduce the integrated development provisions as a subdivision pathway.
44.	Subdivision - Rules	Transferable Title Rights	Amend	The PDP omits transferable development rights (TDRs), which could enable managed growth while protecting ecological and productive rural land. TDRs offer flexibility by shifting development to more suitable areas and are successfully used in other plans, such as the Auckland Unitary Plan.	Consider transferable subdivision rights, particularly within the Rural Lifestyle Zone, similar to the Auckland Unitary Plan approach.
45.	Subdivision – Rules	SUB-S1 and SUB-S3 to SUB-S5	Support in part	We are generally supportive of SUB-S1 to SUB-S5; however, several provisions would benefit from clearer and more precise wording.	Refine the wording of SUB-S1 to SUB-S5 to improve clarity and ensure consistent interpretation and application across different site contexts.
46.	Subdivision – Rules	SUB-S2	Oppose in part	The requirement for a 1,000m <sup>2</sup> building platform is excessive, particularly for smaller rural lifestyle allotments.	Amend the building platform size requirement in SUB-S2 by reducing the minimum area from 1,000m <sup>2</sup> to 500m <sup>2</sup> for rural and rural lifestyle allotments or provide flexibility through a performance

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					standard or geotechnical certification.
47.	Subdivision - Standards	SUB-S6	Oppose in part	The requirement to construct vehicle access at the time of subdivision is impractical in some environments and should instead be a matter considered at building consent.	Amend SUB-S6 to remove the requirement to construct vehicle crossings at the time of subdivision. Instead, require legal access only, with physical construction tied to future development or building consent.
48.	Subdivision - Standards	SUB-S8(2)	Oppose	SUB-S8(2) appears to conflict with the RMA provisions relating to sites greater than 4 hectares and should be deleted.	Delete SUB-S8(2) to ensure consistency with Section 230(3) of the RMA, particularly in relation to sites larger than 4 hectares.
49.	Subdivision - Standards	SUB-S14	Oppose in part	Don't support this standard as it's currently written, and the matters over which discretion is restricted is limited. Further assessment criteria required to assess the impact. Kaipara has recognized these areas as being important in the district, and development and subdivision in these areas therefore needs to be carefully considered.	Include sufficient landscape assessment criteria to carry out an appropriate assessment of a subdivision proposal.

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#	Chapter / Appendix / Schedule / Maps	Objective / Policy / Rule / Standard / Overlay	Oppose / Support	Reasons	Decision Sought
50.	Subdivision – Standards	SUB-S15 – Notes	Support in part	Greater clarity is required regarding the legal status and effect of notes included in SUB-S14, particularly whether they carry any statutory weight.	Clarify the legal status of notes in SUB-S15, and if they are for guidance only, ensure they are clearly labelled as non-statutory and do not influence the interpretation or enforceability of rules.
51.	Earthworks - Rules	EW-R1 to EW-R4	Support	Support the rules	None
52.	Earthworks - Standards	EW-S1 to EW-S6	Support	Support the standards	None
53.	General Residential Zone - Objectives	GRZ-O1 to GRZ-O5	Support	We support the objectives GRZ-O1 to GRZ-O5 within the General Residential Zone chapter of the PDP.	None
54.	General Residential Zone – Policies	GRZ-P1	Support in Part	We generally support the policies in the general residential chapter. GRZ-P1 supports diverse accommodation needs, including semi-attached and terraced housing, which is supported. However, as there is only one residential zone covering varied environments, further consideration is needed regarding the appropriateness and location of these housing types.	Allow greater flexibility for housing typologies with site-responsive designs. This could include proximity requirements to commercial centres and schools.

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55.	General Residential Zone – Policies	GRZ-P2 to GRZ-P8	Support	We support the remaining policies in the general residential chapter.	None.
56.	General Residential Zone – Rules	GRZ-R1, GRZ-R2, GRZ-R7 to GRZ-R11	Support	We support these rules in the general residential chapter.	None.
57.	General Residential Zone – Rules	GRZ-R3 – Two Residential Units	Oppose (in part)	GRZ-R3 permits two residential units per site; however, this would be more appropriately managed as a controlled activity to ensure site-specific effects are assessed.	Amend GRZ-R3 to change the activity status for two residential units from permitted to controlled, allowing Council to assess relevant effects while still supporting residential intensification.
58.	General Residential Zone – Rules	GRZ-R4	Support in part	GRZ-R4 is supported in principle, but aspects of the provision require clearer drafting to improve usability and interpretation.	Clarify the drafting of GRZ-R4 to ensure the rule is easily understood and applied, including clearer wording around the standards and conditions for compliance.
59.	General Residential Zone – Rules	GRZ-R5 – Relocated Dwellings	Support in part	GRZ-R5 should be amended to explicitly include new relocated dwellings, not just existing ones.	Amend GRZ-R5 to explicitly include new relocated dwellings as a permitted activity, not just the relocation of existing dwellings.

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60.	General Residential Zone – Rules	GRZ-R6 – Visitor Accommodation	Oppose in part	GRZ-R6 includes a prescriptive cap on visitor number. This could be managed by the size of the building or floor spaces used for visitor accommodation.	Remove the numeric visitor limit from GRZ-R6 and manage effects through performance standards
61.	General Residential Zone – Rules	GRZ-R12 – Multi-Unit Development	Support in part	GRZ-R12 is supported for enabling multi-unit development, but additional design and locational guidance would ensure better urban outcomes.	Retain GRZ-R12 as a provision enabling multi-unit residential developments, but include additional urban design criteria (e.g., façade treatment, landscaping, streetscape integration) and/or locational qualifiers (e.g., proximity to centres, schools, or transport nodes).
62.	General Residential Zone – Standards	GRZ-S1, GRZ-S2, GRZ-S5 to GRZ-S11	Support	We support these standards in the general residential chapter.	None.
63.	General Residential Zone – Standards	GRZ-S3 – Height in Relation to Boundary	Support in part	GRZ-S3 allows height in relation to boundary to be measured from the far side of a vehicle accessway, which is supported. However, the restriction limiting this provision to accessways less than 6m wide is unnecessary and should be removed.	Amend GRZ-S3 to remove the 6m accessway width requirement.

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#	Chapter / Appendix / Schedule / Maps	Objective / Policy / Rule / Standard / Overlay	Oppose / Support	Reasons	Decision Sought
64.	General Residential Zone – Standards	GRZ-S4 – Fencing	Support in part	GRZ-S4 clause 2(c) refers to boundary fences "less than 1.8m high", which is inconsistent with GRZ-S2 and standard fence heights.	Amend GRZ-S4 clause 2(c) to state: "no greater than 1.8m high" for consistency with GRZ-S2.
65.	General Rural Zone - Objectives	GRUZ-O1 to GURZ-O4	Support	We support the objectives GRUZ-O1 to GURZ-O4 within the General Rural Zone chapter of the PDP.	None
66.	General Rural Zone - Policies	GRUZ-P1 to GRUZ-P6	Support in Part	We generally support the policies in the general rural chapter. However, GRUZ-P4 should include the requirement to avoid, remedy, or mitigate adverse effects of subdivision and development on the rural character and amenity values, including the avoidance or mitigation of ribbon development.	Amend GRUZ-P4 to include the requirement to avoid, remedy, or mitigate adverse effects of subdivision and development on the rural character and amenity values, including the avoidance or mitigation of ribbon development.
67.	General Rural Zone – Rules	GRUZ-R1, GRUZ-R2, GRUZ-R4, GRUZ-R5, GRUZ-R7 to GRUZ-R10	Support	We support these rules in the general rural chapter.	None.
68.	General Rural Zone – Rules	GRUZ-R3	Support in part	GRUZ-R3 is supported in principle, but the wording is unnecessarily complex and may hinder interpretation or compliance.	Reword GRUZ-R3 to improve clarity and usability.

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#	Chapter / Appendix / Schedule / Maps	Objective / Policy / Rule / Standard / Overlay	Oppose / Support	Reasons	Decision Sought
69.	General Rural Zone - Rules	GRUZ-R6	Oppose in part	GRUZ-R6 includes a prescriptive cap on visitor number. This could be managed by the size of the building or floor spaces used for visitor accommodation.	Remove the numeric visitor limit from GRUZ-R6 and manage effects through performance standards
70.	General Rural Zone - Standards	GRUZ-S1 to GRUZ-S4	Support in Part	We support GRUZ-S1 to GRUZ-S4 with minor recommendations. Specifically, GRUZ-S1 allows a building height of 10m as a permitted activity, to maintain rural character and visual amenity values further height restrictions should be in place.	Amend GRUZ-S4 to reduce to maximum 8m height as a permitted activity.
71.	Rural Lifestyle Zone - Objectives	RLZ-O1 to RLZ-O5	Support	We support the objectives RLZ-O1 to RLZ-O5 within the Rural Lifestyle Zone chapter of the PDP.	None
72.	Rural Lifestyle Zone - Policies	RLZ -P1 to RLZ -P4	Support in Part	We generally support the policies in the general rural chapter. RLZ-P3 does look to avoid rural and commercial activities within the rural lifestyle zone, but given the inherently rural nature of some of the locations identified, rural activities are both existing and appropriate.	Amend RLZ-P3 to allow for appropriate rural industry and commercial activities.

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#	Chapter / Appendix / Schedule / Maps	Objective / Policy / Rule / Standard / Overlay	Oppose / Support	Reasons	Decision Sought
73.	Rural Lifestyle Zone - Rules	RLZ -R1, RLZ-R3 to RLZ -R19	Support in Part	We generally support RLZ-R3 to RLZ -R19 with some minor recommendations.	See below.
74.	Rural Lifestyle Zone - Rules	RLZ -R2	Oppose in Part	We do not support RLZ-R2 in its current form, the restriction of one residential unit per site does not take into consideration larger sites within this zone.	RLZ-R2 be amended to make allowance for multiple residential units per site if the density provisions are being meet.
75.	Rural Lifestyle Zone - Standards	RLZ -R6	Support in Part	RLZ-R6 unnecessarily limits visitor numbers, which are already controlled by building standards.	Remove visitor limit from RLZ-R6.
76.	Rural Lifestyle Zone - Standards	RLZ-S1, RLZ-S3 to RLZ-S6	Support in Part	We generally support RLZ-S3 to RLZ-S6. However, RLZ-S1 allows a building height of 10m as a permitted activity, to maintain rural character and visual amenity values further height restrictions should be in place.	Amend RLZ-S1 to reduce to maximum 8m height as a permitted activity.
77.	Rural Lifestyle Zone - Standards	RLZ-S2	Oppose in Part	We do not support RLZ-S2, the setback requirement of 10m to all boundaries is inconsistent with the both the operative and PDP rural zone requirements. The setback requirement should be consistent	RLZ-S2 be revised to a 3m setback requirement from rear and side yards.

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#	Chapter / Appendix / Schedule / Maps	Objective / Policy / Rule / Standard / Overlay	Oppose / Support	Reasons	Decision Sought
				with the 3m rear and side yard setback requirements	
78.	Commercial Zone - Objectives	COMZ-O1, COMZ- O2 and COMZ-O3	Support	We are in general support the proposed objectives	Retain the objectives
79.	Commercial Zone - Policies	COMZ-P1, COMZ- P2, COMZ-P3 and COMZ-P4	Support	We are in general support the proposed objectives	Retain the policies
80.	Commercial Zone - Standards	COMZ-S1 - S14	Support	We in general support the standards and the supporting assessment criteria	Retain the standards